

ORIGINAL

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

CIVIL RIGHTS COMPLAINT PURSUANT TO 42 U.S.C. § 1983

2013 DEC 11 AM 10:28

DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE ~~SOUTHERN~~ DISTRICT OF ~~MISSISSIPPI~~

Robert Heard

(Enter above the full name and prisoner  
identification number of the plaintiff.)

-VS-

3-13CV-4830D

Brian Owens, Shevondah  
Fields, Sheandra Caldwell, Ricky  
McRicks, Sharon Lewis,  
(Enter above the full name of the defendant(s).)  
*See Attach.*

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with (1) the same facts involved in this action, or (2) otherwise relating to your imprisonment?

Yes ( ☒ ) No ( ☐ )

- B. If your answer to A (1) or (2) is yes, describe each lawsuit in the space below and tell us whether the "old" case involves the same facts or other issues. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s): Robert Heard

Defendant(s): Suzette F. Bunn

2. Court (if federal court, name the district; if state court, name the county):

NORTHERN DIST. OF Cal., PLYMOUTH, DIVISION

3. Docket Number:

1:03-CV-3119-CAP

**I. Previous Lawsuits (Cont'd)**

4. Name of judge to whom case was assigned: Charles D. Nease, Jr.
5. Did the previous case involve the same facts?  
basically the same  
Yes ( ☒ ) No ( ☐ )
6. Disposition (Was the case dismissed? Was it appealed? Is it still pending?):  
Yes, Dismissed
7. Approximate date of filing lawsuit: Nov. 2003
8. Approximate date of disposition: Nov 13, 2003

**II. Exhaustion of Administrative Remedies**

- A. Place of Present Confinement: Valle Vista State Prison
- B. Is there a prisoner grievance procedure in this institution?  
Yes ( ☒ ) No ( ☐ )
- C. Did you present the facts relating to your complaint in the state prisoner grievance procedure?  
Yes ( ☒ ) No ( ☐ )
- D. If your answer is YES:
1. What steps did you take and what were the results?  
Multiple times on different issues I wrote letters to the prison B. & now we are in a grievance process. I have not been heard about about "inmate" issues.
2. If your answer is NO, explain why not: N/A

**III. Parties**

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

- A. Name of Plaintiff(s): Robert L. Ward
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

### III. Parties (Cont'd)

Address(es): Yaldosta State Prison  
P.O. Box 310  
Yaldosta, GA. 31603

(In item B below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Do the same for each additional defendant, if any.)

B. Defendant(s): Brian Owens, Shevannish Fields, Sheandra Calhoun,  
Ricky Mulricks, Sharon Lewis, Thunbert Baker, George  
W. Belsa, Jr., Gerry Jones.

Employed as D.O.C., D.O.C., D.O.C., D.O.C., D.O.C., FORMER STATE  
Attorney Gen. of GA, FORMER U.S. PRESIDENT, DALLAS, TEX. BILLIMONIRE.

at Atlanta, D.O.C., D.O.C., D.O.C., D.O.C., Atlanta, GA, Texas,  
Dallas, Texas

### IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

I come to court to ask to use the imminent danger clause, and  
to assert that the defendants acted under color of law, exerting  
deliberate indifference, in so much they conspired to take  
my life by various means, from giving me sicknesses, and  
diseases, to witchcraft, and those named and unnamed did  
advise, encourage, hire, procure, judges, inmates and all in-  
olved to commit the prohibited acts by law. By aiding and  
abetting their endeavors. O.C. GA. 16-12-20, Carter v. State 169 Ga.  
App. 177, 308 S.E. 2d 458 (1983). Parnell v. State 213 Ga. App. 581, SE. 2d  
263 (2003). I can use circumstantial evidence to prove the Burke  
v. State 234 Ga. 512, 216 SE. 2d 812 (1975). I assert that all the  
defendants knew the essential objectives of the conspiracy  
to shut me up about J.T. Blackman's murder, to stop me  
from winning Heard v. Nix, Heard v. Baines, Heard v. Brown,  
Weatherford 4 times, Bush 2 times (in as much a secret  
service officer Griffith came to me at Johnson State Prison  
I did not connect it then about Mr. Bush, he said he had friends  
that work that way. But I found out that by the same



And by the same ruling this court can order relief the constitution does not require on its own force, to remedy a constitutional violation. And it is surely such when the defendants have committed murder and sought to cover it up, and at my attempt to bring the guard to justice, and their attempt to hinder that, they attempt to control me by emasculation through witchcraft. Having of a long season to attempt to kill me as they did my mother, for they used that same approach to make billions of dollars by probing my mind or brain, using those same tactics. And I told my mother and filed against Mr. Bush. They set my mother up to die and she did, and tried to do it to me. And the only reason they failed is, I am anointed by God to preach the word of God and that anointing destroys every yoke. So after they tried to give me every disease from hep e to AIDS to hypertension and enhance the situation to cause my demise, they tried to and every imaginable sickness and after they saw it did not work because of the anointing, began to use the same tactics of witchcraft to pocket money from D.O.C. budget by cutting back on medicine because they used me to heal people. Bringing me their diseases right down to seizures, diabetes and mental illness as well. Now we have a situation at large where though it started in 1998, it has escalated to this date because each person had to enter into the conspiracy to keep it away from my family, and now I am at a loss for any avenue to have my son, that is because of their attempt to cause my death and emasculate me, and control me to stop my revealing it to the public. And now I must go to the president of the US to reveal it. And to the public. For I will not allow this administration to target small, big, Josh, Black, or Gay D-spot. For I will petition the Chinese Room of glory and God shall give me all I need to protect what belongs to me. And I mean that.

Therefore let us come to grips with the essence of it all. The concert of the crimes of murder in conspiracy are in conjunction with the fact that it was organized efforts between state and federal officials and inmates by which we know we can easily prove by virtue of law and we can use a number of any sources to make a most devout and plausible

Falls to the remedial steps to prevent that harm, their conduct is ~~the~~ tacit authorization and definitely deliberate indifference to the offensive act. And is independently liable, and is a fact that has been most definitely known throughout 2002 through 2013. And absolutely no one said or did anything to prevent death but aided it by no health care, and increased diseases to consummate it. See suits included.

Even if the people named did not put a physical hand to the crime they acted with someone that did, and that someone was BRIAN OWENS, JAMES DONALD, D.O.C. etc, and they were colored under state law. Richardson-v-Fleming 651 F2d 366, 368-69 n3 (5<sup>th</sup> Cir. 1981). Phillip-v-Mashburn 746 F2d 782, 785 (11<sup>th</sup> Cir. 1984). Fullman-v-Bradrick 739 F2d 553, 558 (11<sup>th</sup> Cir. 1984). And we can not forget by law each person in a conspiracy is responsible for the other's acts. Causey-v-State 164 Cal. App. 74, 267 S.E. 2d 475 (1980).

And now therefore D.O.C. and the rest of the defendants have sought to keep me in prison paying date which was 6/29/13, and now what we have is false imprisonment to hide the fact that they destroyed my ability to have my son and can not repair it. And sought to take my life because they knew I had found out they murdered my mother the same way. So they attempted to beat me from 5/9/13 - Oct. 2013, to stop me from saying anything about it. And when Dre and Black and Josh and that D-spot would not let it occur anymore after they heard Foster say he had a or rather there was a hit on me. Therefore we come to this conclusion, organized efforts and racketeering efforts have been of a long season to cause death by no medical help, after giving diseases that belonged to other people. So they could kill me slow and keep the money.

I ask this court to look at Miller-v-Donald 541, F3d 1091 (11<sup>th</sup> Cir. 2008) which was used in Heard-v-Donald No: 06-12229 in which D.O.C. tried that Dr. Bennett never worked at D.O.C. Reidsville and govern my case as such. As well as Martin-v-Goord 255 F2d 40 (CA 2 NY 200) 42 U.S.C. 1997e(A).

RIVERA v. PATEL 2003 U.S. Dist. Lexis 11266 (S.D. NY 2003). I have  
Case 3:13-cv-04830-D-BN Document 3 Filed 12/11/13 Page 7 of 12  
this court know that any less than exhaustion  
is a statistic exhaustion requirement. 42 U.S.C. 1997(e)(A). Also  
claims alleging retaliatory conduct directed at inmate or against  
are not brought with respect to prison conditions and not  
subject to exhaustion. 42 U.S.C. § 1997(e). And my avowal is  
they retaliated against me and are yet doing it to stop me  
from going home so they can let me die, or cause my death.  
We must also realize that though names are not mentioned  
in the caption as defendants, if it be found they were involved  
in the conspiracy it or they can be tried and convicted. BRANT v. STATE  
227 Ga. App. 243, 488 S.E.2d 743 (1997). CARTER v. STATE 169 Ga. App. 177, 308 S.E.  
2d 438 (1983).

A motive has been shown with intent to violate my constitutional,  
civil, human rights, by officials acting under color of law which re-  
sulted in pure torture. see: HEARD v. DONALD NO. 06-12229, HEARD v.  
ALLEN 109-CV-114, WLS. 28 U.S.C. § 1350. MAJORS v. RIDLEY-TURNER (2003, MD  
IND.) 277 F. Supp. 2d 916. Fed. R. Civ. P. 8, P. 9(b), P. 8(a)(2) entitles me to  
Relief.

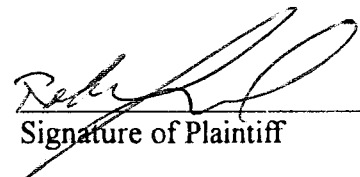
I therefore ask this court to look at MOORE v. BACHMEIER (2004, D.C. MD) 315  
F. Supp. 2d 1099. And AYERS v. MORRIS (1999, E.D. ARK.) 43 F. Supp. 2d 1039. HIGGIN  
v. CARPENTER (2001, CA 8 ARK.) 258 F.3d 797. MEHDIPOUR v. STATE EX REL  
DEPT. OF CORR. (2004) 2004 OK 14, 90 P3d 546. 28 U.S.C. § 1367. STEPHEN v.  
TWADDE (2005, CA 5 TEX) 145 Fed. Appx. 44.

my complaint must therefore be by law found meritorious and be heard  
for it lines up with the constitutions of CA & US. And Fed & State law.  
I conclude with, I am being held past my release date, D.O.C. has taken  
all my property, I have had no socks since May 2013, 1 shirt, no  
clover or anything else. They took my shower shoes & socks. 7800.00 over  
the course of time. To make me drop grievances & suits, which Sherman  
Fields, S. Lewis, S. Calhoun, Ricky Nicks never allowed to show up.  
And I'm in prison illegally since 6/29/13. And all of D.O.C. is aware of it.  
Then and knows cause and got all my legal property and made me know it away  
so there would be but little evidence, but I yet have more than enough.

V. Relief (Cont'd)

Doing my life. \$100,000,000.00 actual damages because of the irreparable damages that being about had, hurting my memories, which some say is emotional, it is not, it results of the emotion that is caused by my not being able to have a normal life like the ones who did it to me. \$100,000,000.00. And I want hospital bills paid forever for research to cure every disease given me, by defendants and inmates. Please be reminded I will not be at all deterred from pursuing any of the contents of this suit. People keep getting beat like me, you get concerned. 11/28/13

Signed this 28 day of November 2013.

  
Signature of Plaintiff

STATE OF Georgia  
COUNTY (CITY) OF Lanier

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED ON 11/27/13  
(Date)

  
Signature of Plaintiff



- (6) Fred B. Brown - D.O.C. Employee
- (7) R.D. Collins - D.O.C. Employee
- (8) Sandra Moore - D.O.C. Employee
- (9) Ricky Mincey - D.O.C. Employee - Retired
- (10) Earl Sikes - D.O.C. Employee - Retired
- (11) Johnny Sikes - D.O.C. Employee -
- (12) Benji Nobles - D.O.C. Employee -
- (13) Counselor McCaskill - D.O.C. Employee
- (14) Laura L. Homes - Dept. of Law
- (15) Cal. Parole Bd.
- (16) Internal Affairs - D.O.C.
- (17) Judicial Misconduct Commission (serving the Honorable Joel F. Dubina)
- (18) Keith Butler - D.O.C. Employee
- (19) Dennis Simon Johnson - Attorney, 14<sup>th</sup> Street, Atlanta, Ga.
- (20) Hugh Smith - D.O.C. Employee
- (21) Dr. R. Paldi - D.O.C. Employee
- (22) Dr. Bennett - D.O.C. Employee
- (23) Ahmad Holt - D.O.C. Employee
- (24) Charlotte Chamblay - D.O.C. Employee
- (25) Elaine Hutto - D.O.C. Employee
- (26) Jose Morales - D.O.C. Employee
- (27) Anthonette Toby - D.O.C. Employee
- (28) Timothy Jones - D.O.C. Employee
- (29) Cathy Tanner - D.O.C. Employee
- (30) Keith Morris - D.O.C. Employee
- (31) Paula Duncan - D.O.C. Employee
- (32) Lt. James Blair - D.O.C. Employee
- (33) Reg. Dir. Upson or Upson - D.O.C. Employee
- (34) Med. Dir. Newman - D.O.C. Employee
- (35) William Danforth - D.O.C. Employee
- (36) Cedric Taylor - D.O.C. Employee
- (37) Marty Allen - D.O.C. Employee
- (38) Calvin Orr - D.O.C. Employee

- (39) Ted Philbin - D.O.C. Employee
- (40) Unit Manager Terrell - D.O.C. Employee
- (41) Shawn Farnous - D.O.C. Employee
- (42) Mr. Gibson - D.O.C. Employee
- (43) Capt. Carter - D.O.C. Employee
- (44) Capt Officer Westlake - D.O.C. Employee
- (45) Sgt. Lamin - D.O.C. Employee
- (46) Lt. Sgt. Sneider - Former D.O.C. Employee
- (47) Med. Dir. Al Jones - D.O.C. Employee
- (48) William Terry - D.O.C. Employee
- (49) William Powell - D.O.C. Employee
- (50) Robert Foster - D.O.C. Employee
- (51) Sally Q. Yates - ~~Former D.O.C. Employee~~ U.S. Attorney, Atlanta, Ga., D.O.S.
- (52) James Phelps - D.O.C. Employee
- (53) FBI Director - Atlanta, Ga., D.O.S.
- (54) Carlton H. Peoples - FBI - Atlanta, Ga.
- (55) Kenneth L. Moore - FBI - Atlanta, Ga.
- (56) Milton Hall - D.O.C. Employee
- (57) Capt Officer Riley - D.O.C. Employee
- (58) WSB News (Action News) Atlanta, Ga.
- (59) The Atlanta Constitution
- (60) Owner of Washington Redskins
- (61) Lt. McDougall
- (62) Officer Staten, Ga.

INmate Help Needed (Fee \$50,000.00) fee is now 200,000.00

- (1) Elizabeth Keys
- (2) Robert Smith
- (3) Kelly Stephens
- (4) Scott
- (5) Butler
- (6) Snapp
- (7) Jimmy Harris
- (8) Vincent Lupton
- (9) Dexter Hagar
- (11) B.C.

- (1) Heard v. Weathersford - 1102-CV-684-CAM
- (2) ~~Case 3:13-cv-04830-B~~ Document 3 Filed 12/11/13 Page 11 of 12 PageID 14
- (3) Heard v. Ashcroft - 03-073 (D.C. Dist.) 603-060 (S.D. Cal. 2003)
- (4) Heard v. Man. Smith - CV402-277
- (5) Heard v. Parole Bd. - Fulton Sup. Court 2002
- (6) Heard v. Parole Bd. - 1101-CV-1454-CAM
- (7) Heard v. Parole Bd. - 1101-CV-2311-CAM
- (8) Heard v. Edenfield - 2010 U.S. Dist. Leks 104807 (S.D. Cal. Sept. 30, 2010)
- (9) Heard v. Weathersford - CV602-107 (S.D. Cal. Feb. 13, 2003)
- (10) Heard v. Tanner - 2011 U.S. Dist. Leks 103909 (M.D. Cal. Sept. 14, 2011)
- (11) Heard v. Treadwell - 11-10235 (M.D. Cal. 3/11/11)
- (12) Heard v. Donald - 1110-CV-1726
- (13) Heard v. Donald - 1110-CV-2630-CAP
- (14) Heard v. Donald - No. 06-12229 - C112 (Cal. 2009)
- (15) Heard v. Allen - 1109-CV-119-WLS
- (16) Heard v. Owens - 5109-CV-357 (M.D. Cal. No. 10-14027-B)
- (17) Heard v. Owens - 1111-CV-2357-CAP-EES, No. 11-1505-C.
- (18) Heard v. Perdue - 2010 CV-402, App. No. 511A0832
- (19) Heard v. Morales - 2011-CV-62
- (20) Judicial Misconduct Commission (sitting The Honorable Joel F. Dubina)
- (21) D.O.S. Complaints in Atlanta, Sally Q. Yates
- (22) FBI Complaints FBI Atlanta
- (23) Heard v. Fields - 5112-CV-29-CAP
- (24) Heard v. Danford - 1112-CV-5-HL
- (25) Letters To Internal Affairs D.O.C.
- (26) Heard v. Gale Buckner - 1111-CV-3177
- (27) Heard v. Edenfield - 1111-CV-2828-CAP
- (28) Heard v. Pannell - M.D. Cal.
- (29) Heard v. Watt Davis - 1110-CV-1065-CAP
- (30) Heard v. Fields - 7113-CV-25-HL
- (31) Heard v. Sgt. Brown 1113-CV-3290-CAP-EES
- (32) Heard v. Yates - N.D. Cal.
- (33) Heard v. O'Kelly Source 23, 2013
- (34) Heard v. O'Kelly - 2013

Robert Howard 373634-H2  
VA Alberta State Prison  
P.O. Box 310  
Valdosta, Ga  
31603

Office of the Clerk  
United District Court  
for the Northern District of Texas  
1100 Commerce St., Rm. 1452  
Dallas, Texas 75242

